URBAN DRAINAGE AND FLOOD CONTROL DISTRICT

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Federal Communications Commission
Mrs. Marlene Dortch, Secretary
445 12th Street, S.W.
Washington, DC 20554

RE: Letter in Response to RM-11681 Petition for Rulemaking:
Ligado's Request to Allocate the 1675-1680 MHz Band for Terrestrial Mobile Use Shared with Federal Use

Dear Ms. Dortch:

The Urban Drainage and Flood Control District (UDFCD) urges you to safeguard current public safety uses of the 1675-1680 MHz spectrum band that specifically includes the Geostationary Orbiting Environmental Satellites (GOES) and the forthcoming GOES-R Series, which receive and transmit meteorological and hydrologic data to ground receiving/downlink stations from many northeast Colorado locations.

UDFCD partners with 40 local governments that make up the Denver/Boulder metropolitan area to mitigate flood risks and manage stormwater for approximately 1,600 miles of major drainageways. This region of 2.8 million people represents more than half the State's population and like many other U.S. communities, is frequently impacted by floods with flash flooding being the most common threat. Consequently, timely delivery of water level information for rivers, creeks, normally dry gulches, and reservoirs is critical. This fact was demonstrated most recently during the Colorado floods of September 2013 that resulted in approximately $4 billion in losses and relatively few fatalities.

UDFCD has significant concerns regarding the Federal Communication Commission's (FCC) plan to share the 1675-1680 MHz radio spectrum between a new terrestrial broadband wireless provider venture and long established federal, state, and local government meteorological and hydrological data providers. Without reliable signal transmission and reception to and from GOES Data Collection Systems (DCS), hydrological data collection and distribution systems operated by the USGS and many other state and local water agencies would be unable to provide essential time-sensitive water level information to decision makers.

In the interest of public safety, we urge the FCC to not move forward with this action until:

1. adequate zone protection from radio interference is established for USGS and other federal, state, and local GOES and GOES-R downlink sites;
2. public safety uses of the 1675-1680 MHz spectrum band are recognized and receive priority protection;
3. several years of testing clearly demonstrate that high-power commercial wireless service systems can safely co-occupy the nationally critical hydrometeorological spectrum without disrupting GOES downlink services; and
4. a clear and fair process exists to resolve spectrum use conflicts that arise between the wireless service companies and the impacted federal and non-federal agencies.

Reliable, accurate, and timely hydrological and meteorological data is imperative for effective flood warnings, emergency management, operational hydrologic models, water supply management, reservoir operations, and recreational safety. Anything less will threaten public safety, increase flood losses and adversely impact economic activities.

Thank you for considering our recommendations.

Sincerely,

Paul A. Hindman, P.E.
Executive Director